

1 YI LIN ZHENG, ESQ.  
2 Nevada Bar No. 10811  
3 VEGAS GOLDEN LAW  
4 2801 S Valley View Blvd, Ste 16  
5 Las Vegas, NV 89102  
6 Phone (702) 385-7170  
[VegasGoldenLaw@gmail.com](mailto:VegasGoldenLaw@gmail.com)  
7 Attorney for Defendant  
8 Stephon Whitney

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATE OF AMERICA,

Plaintiff,

v.

STEPHON WHITNEY,

Defendant.

Case No. 21-cr-0002-JAD-NJK

**SECOND SUPPLEMENTAL  
SENTENCING MEMORANDUM**

Yi Lin Zheng, counsel for defendant Stephon Whitney, hereby files this second supplemental sentencing memorandum in conjunction with the sentencing memorandum (ECF #41) and supplemental sentencing memorandum (ECR #42) respectfully requesting a sentence of 28 MONTHS as sufficient, but not greater than necessary to achieve the goals of sentencing.

**SUPPLEMENTAL EXHIBITS IN AID OF SENTENCING**

Attached hereto, please find a list of additional exhibits in support of Mr. Whitney's arguments in mitigation of sentence:

O. Letter from C. Fletcher, Unit Manager at Nevada Southern Detention Center, stating Mr. Whitney is a detainee in good standing;

P. Certificates of Completion for successfully completing:

- Skillsoft: Receiving Feedback, June 27, 2022;
- Skillsoft: Uncovering and Utilizing Your Talents and Skills, June 27, 2022;
- Skillsoft: Take a Deep Breath and Manage Your Stress; June 27, 2022;

- 1     • Skillsoft: Solving Problems: Generating and Evaluating Alternatives, June 27, 2022;
- 2     • Skillsoft: Reaching Sound Conclusions, June 27, 2022;
- 3     • Skillsoft: Planning an Effective Presentation, June 27, 2022;
- 4     • Skillsoft: Making and Carrying Out Tough Decisions, June 27, 2022;
- 5     • Skillsoft: The Art of Staying Focus, June 27, 2022;
- 6     • Skillsoft: Understanding Unconscious Bias, June 27, 2022;
- 7     • Skillsoft: Overcoming Unconscious Bias in the Workplace, June 20, 2022;
- 8     • Skillsoft: Overcoming Your Own Unconscious, June 20, 2022;
- 9     • Skillsoft: Managing Pressure and Stress to Optimize Your Performance, June 18, 2022;
- 10    • Skillsoft: Interaction with Customers, June 16, 2022;
- 11    • Skillsoft: Establishing Self-Confidence for Life, June 16, 2022;
- 12    • Skillsoft: Ensuring Successful Presentation Delivery, June 15, 2022;
- 13    • Skillsoft: Difficult People: Why They Act That Way and How to Deal with Them, June 15, 2022;
- 14    • Skillsoft: Cultivating Relationships with Your Peers, June 14, 2022;
- 15    • Skillsoft: Choosing and Using the Best Solution, June 14, 2022;
- 16    • Skillsoft: Building Your Presentation, June 13, 2022;
- 17    • Skillsoft: Become a Great Listener, June 13, 2022;
- 18    • Skillsoft: Time Management, June 11, 2022;
- 19    • Skillsoft: Substance Abuse Education, June 11, 2022;
- 20    • Skill Based Education, June 10, 2022;
- 21    • Presentation Skills, June 10, 2022;
- 22    • My SWOT – How to Use Your Knowledge, June 9, 2022;
- 23    • Identification Package, June 8, 2022;
- 24    • Job Readiness, June 8, 2022;
- 25    • Healthy Coping Skills, June 7, 2022;
- 26    • Health Education, June 6, 2022;
- 27    • Financial Literacy; June 6, 2022;
- 28    • Family and Community Reunification, June 4, 2022;
- 29    • Expectations and Outcomes, June 3, 2022;
- 30    • Exercising, June 2, 2022;
- 31    • Entrepreneurship, June 2, 2022;
- 32    • Contemporary Technology Skills – v2, June 2, 2022;
- 33    • Conflict Resolution, June 1, 2022;
- 34    • Career Resources, May 31, 2022;
- 35    • Basic Education, May 31, 2022;
- 36    • Behavior Change, May 31, 2022; and
- 37    • Anger Management, May 30, 2022.

1 DATED: October 31, 2022.

2 Respectfully submitted,

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4 By: /s/ Yi Lin Zheng  
5 Yi Lin Zheng, NV #10811  
6 Vegas Golden Law  
7 Attorney for Stephon Whitney

8 **CERTIFICATE OF ELECTRONIC SERVICE**

9 The undersigned hereby certifies that she is an employee of the Vegas Golden Law and  
10 is a person of such age and discretion as to be competent to serve papers.  
11 That on the 30<sup>th</sup> day of November, 2022, she served an electronic copy of this **SECOND**  
12 **SUPPLEMENTAL SENTENCING MEMORANDUM** by electronic service (ECF) to the  
13 persons named below:  
14

15 JASON FRIERSON  
16 United States Attorney  
17 DANIEL COWHIG  
18 Assistant United States Attorney  
501 Las Vegas Blvd. South  
Suite 1100  
Las Vegas, NV 89101

19  
20 /s/ Yi Lin Zheng  
21 Employee of Vegas Golden Law  
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